

ENVIRONMENTAL ASSESSMENT

FOR

DEVELOPMENT AND IMPLEMENTATION OF A

HISTORIC PROPERTIES COMPONENT (HPC) PLAN

FOR FORT SAM HOUSTON AND CAMP BULLIS

IN ACCORDANCE WITH ARMY ALTERNATE

PROCEDURES

Prepared for

Directorate of Safety, Environment, and Fire
Fort Sam Houston, Texas

By

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**FINDING OF NO SIGNIFICANT IMPACT
FOR THE DEVELOPMENT AND
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SUMMARY

The US Army has prepared an Environmental Assessment (EA) for the development and implementation of a Historic Properties Component (HPC) Plan in accordance with the Army Alternate Procedures (AAP) for Fort Sam Houston (FSH) and Camp Bullis (CB). Based on the following summary of effects (and as discussed in the accompanying EA), the US Army has determined that the Proposed Action (as described below and in the EA) is not a major federal action significantly affecting the quality of the human environment, within the meaning of the National Environmental Policy Act of 1969 (NEPA). Therefore, preparation of an Environmental Impact Statement (EIS) is not required.

INTRODUCTION

This EA is prepared in accordance with the National Environmental Policy Act (NEPA), its implementing regulations published by the Council on Environmental Quality (CEQ Regulations), and Department of the Army 32 CFR Part 651, Environmental Analysis of Army Actions; Final Rule (32 CFR Part 651), dated March 29, 2002. NEPA, the CEQ Regulations, and 32 CFR Part 651 collectively establish a process by which the Department of the Army (Army) identifies and considers proposed actions and a range of reasonable alternatives, the environmental consequences associated with them, and invites the views of interested members of the public prior to deciding on a final course of action.

BACKGROUND

In 2000, the Advisory Council on Historic Preservation (Council) published revised implementing regulations at 36 CFR Part 800. Those regulations authorized the Council to approve agency “program alternatives” for compliance with 36 CFR Part 800. One program alternative authorized under the Council’s revised regulations is Alternate Procedures. Once adopted, Alternate Procedures stand in place of the procedures for project review set forth in 36 CFR Part 800, Subpart B. After years of consultation with State Historic Preservation Officers (SHPOs) and Federally recognized Indian Tribes and coordinating with interested members of the public, the Army submitted and the Council approved the Army Alternate Procedures (AAP). The AAP were published in the Federal

Register at Volume 67, Number 44, p. 11038. The Federal Register publication summarizes the effect of the AAP as follows: “The AAP authorizes Army installation commanders to develop a Historic Property Component (HPC) to the installation’s Integrated Cultural Resources Management Plan (ICRMP). Once certified by the Council, the HPC serves as the installation’s Section 106 compliance agreement for a five-year period. The installation’s Section 106 compliance responsibilities would be met through internal installation implementation of the HPC rather than case-by-case, formalized, external review of individual undertakings as presently required by 36 CFR Part 800.”

FSH has reviewed the various options for managing historic properties in accordance with Section 106 and has determined that development and implementation of an HPC under the AAP could meet the various objectives set forth below in the Purpose and Need for action. Therefore, this EA identifies development and implementation of an HPC under the AAP as the installation’s proposed action.

PROPOSED ACTION

FSH proposes to develop and implement an HPC for compliance with Section 106 of the National Historic Preservation Act (NHPA) and comprehensive management and preservation of historic properties on lands owned or controlled by FSH. These lands include FSH, Camp Bullis, and Canyon Lake Recreational Area. Under the proposed action, undertakings would be identified and reviewed in accordance with the HPC for a five year period rather than 36 CFR Part 800, Subpart B. The installation would be responsible for implementing the HPC and maintaining the professional capabilities for doing so.

ALTERNATIVES CONSIDERED

Alternative 1, No Action Alternative: This alternative would maintain the status quo, continued review of undertakings primarily through case-by-case review under 36 CFR §§800.3 through 800.6. This alternative was rejected because it is less efficient than the proposed action.

Alternative 2: This alternative would also continue compliance through 36 CFR Part 800, but would focus on development of a series of Programmatic Agreements, under 36 CFR Part 800.14(b), rather than case-by-case review of undertakings. This alternative was rejected because it also is less efficient than the proposed action.

ENVIRONMENTAL IMPACTS OF THE PROPOSED ACTION

Direct Impacts: The proposed action would continue to require the installation to identify projects with the potential to effect historic properties. The installation would remain responsible for assessing effects to such properties, and, where appropriate, treating adverse effects. The installation would remain responsible for applying professional expertise and involving stakeholders. The primary distinction would be the

installations implementation of an agreed-upon plan for management of historic properties. The installation would not be required to seek formal external review of projects. The installation would use its HPC, a component of the ICRMPs, as its method for complying with Section 106 of the NHPA. As a result, the process will be streamlined and efficient. Historic property management would be better integrated into installation facilities and land planning and management. The proposed action, therefore would have a direct beneficial impact on historic properties. The impact is not considered significant.

Indirect Impacts: Development and implementation of the HPC should result in development of stronger relationships with stakeholders and the potential for greater stakeholder involvement in management of historic properties on FSH and CB. In addition, the HPC will serve as a legal compliance agreement and is thus more likely to receive funding for implementation. A management approach to compliance should raise the visibility and awareness of historic preservation among all function elements of the installation. The proposed action, therefore, is likely to result in indirect beneficial impacts to historic properties on FSH and CB. These impacts are not anticipated to be significant.

Cumulative Impacts: A cumulative impact occurs when the proposed action has the potential to synergistically combine with the impacts of past, present or reasonably foreseeable future actions in a way that increases the scope and or intensity of the proposed action's impact. There are no anticipated cumulative impacts associated with the proposed action.

DOCUMENT AVAILABILITY

A draft EA and Finding of No Significant Impact (FONSI) are available for public review and comment at the following locations: Public Affairs Office, Building 124, 1212 Stanley Road, Fort Sam Houston, TX 78234; Fort Sam Houston Library, Building 1222, 2601 Harney, Fort Sam Houston, TX 78234; and the San Antonio Public Library, 600 Soledad Plaza, San Antonio, TX 78205.

All interested agencies, groups, and individuals are invited to submit written comments on the EA and FONSI to the address listed below within 30 days of the date of the Notice of Availability published in the San Antonio Express News.

CONCLUSION

No cumulative impacts are expected from the development and implementation of an HPC Plan for FSH and CB in accordance with the AAP. Based on the findings of this environmental assessment, no significant environmental impacts would occur from the Proposed Action. Therefore, an issuance of a FONSI is warranted and an environmental impact statement is not required.

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Colonel, US Army
Commanding

DATE

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1.0 INTRODUCTION

1.1 Background

This Environmental Assessment (EA) is prepared in accordance with the National Environmental Policy Act (NEPA), its implementing regulations published by the Council on Environmental Quality (CEQ Regulations), and Department of the Army 32 CFR Part 651, Environmental Analysis of Army Actions; Final Rule (32 CFR Part 651), dated March 29, 2002. NEPA, the CEQ Regulations, and AR 32 CFR Part 651 collectively establish a process by which the Department of the Army (Army) identifies and considers proposed actions and a range of reasonable alternatives, the environmental consequences associated with them, and invites the views of interested members of the public prior to deciding on a final course of action.

Section 106 of the National Historic Preservation Act (NHPA) directs the Army to do two things. Prior to going forward with any project that may affect a property either listed or eligible for listing on the National Register, the Army must first take into account the effects of the project on the historic property. In addition, the Army must provide the Advisory Council on Historic Preservation (Council), the independent Federal agency responsible for administration and oversight of the Section 106 compliance process, a reasonable opportunity to comment on the undertaking. These two fundamental requirements have traditionally been broken down into a detailed, and often lengthy, sequential project-by-project process set forth in 36 CFR Part 800. That process proceeds from identification of necessary participants and historic properties that might be affected by an undertaking, assessment of the undertakings effects, and resolution of adverse effects through development and implementation of either a Memorandum of Agreement (MOA) or Programmatic Agreement (PA). The Council, State Historic Preservation Officers (SHPOs) and Federally recognized Indian Tribes have a right to participate in the process as consulting parties in particular circumstances. Interested members of the public may be invited to participate as consulting parties, and, at a minimum, must be given an opportunity to express their views when an undertaking may result in adverse effects to historic properties. This process applies to each and every proposed Army activity with the potential to affect an historic property. These activities are known as “undertakings.”

Given the complex nature of the compliance requirements under the NHPA and other cultural resource laws and Executive Orders, the Army developed and published detailed implementing policy and guidance, Army Regulation (AR) 200-4 *Cultural Resources Management* (AR 200-4) and Department of the Army Pamphlet 200-4 *Cultural Resources Management* (DA PAM 200-4). AR 200-4 directed all major Army installations to prepare an Integrated Cultural Resources Management Plan (ICRMP). Every ICRMP contains a chapter providing for management of historic properties in

accordance with the NHPA. Fort Sam Houston (FSH) and Camp Bullis (CB) completed their ICRMPs in 2001.

In 2000, the Council published revised implementing regulations at 36 CFR Part 800. Those regulations authorize the Council to approve agency “program alternatives” for compliance with 36 CFR Part 800. One program alternative authorized under the Council’s revised regulations is Alternate Procedures. Once adopted, Alternate Procedures stand in place of the procedures for project review set forth in 36 CFR Part 800, Subpart B. After years of consultation with State Historic Preservation Officers (SHPOs) and Federally recognized Indian Tribes and coordinating with interested members of the public, the Army submitted and the Council approved the Army Alternate Procedures (AAP). The AAP were published in the Federal Register at Volume 67, Number 44, p. 11038. The Federal Register publication summarizes the effect of the AAP as follows: “The AAP authorizes Army installation commanders to develop a Historic Property Component (HPC) to the installation’s ICRMP. Once certified by the Council, the HPC serves as the installation’s Section 106 compliance agreement for a five-year period. The installation’s Section 106 compliance responsibilities would be met through internal installation implementation of the HPC rather than case-by-case, formalized, external review of individual undertakings as presently required by 36 CFR Part 800.”

The Army has reviewed the various options for managing historic properties in accordance with Section 106 and has identified the request for “Program Comments” as its preferred course of action. Therefore, this EA identifies request for and implementation of Program Comments as the proposed action. This EA will also give full consideration and evaluation to two reasonable alternatives to the proposed action. The first alternative, Alternative 1, is the “No Action” alternative which would maintain the status quo, continued review of undertakings primarily through case-by-case review under 36 CFR §§800.3 through 800.7. The second alternative, Alternative 2, would also continue compliance through 36 CFR Part 800, but would focus on development of a series of Programmatic Agreements, under 36 CFR Part 800.14(b), rather than case-by-case review of undertakings.”

FSH has reviewed the various options for managing historic properties in accordance with Section 106 and has determined that development and implementation of an HPC under the AAP could meet the various objectives set forth below in the Purpose and Need for action. Therefore, this EA identifies development and implementation of an HPC under the AAP as the installation’s proposed action. This EA will also give full consideration and evaluation to two reasonable alternatives to the proposed action. The first alternative, Alternative 1, is the “No Action” alternative which would maintain the status quo, continued review of undertakings primarily through case-by-case review under 36 CFR §§800.3 through 800.6. The second alternative, Alternative 2, would also continue compliance through 36 CFR Part 800, but would focus on development of a series of Programmatic Agreements, under 36 CFR Part 800.14(b), rather than case-by-case review of undertakings.

This EA, by setting forth and analyzing relevant environmental issues and impacts and considering the comments of the public, will provide the basis upon which the Army will determine either that the proposed action and alternatives will not present significant impacts to the human environment, in which case a Finding of No Significant Impact (FONSI) will be issued; or, that the proposed action and alternatives may present significant impacts, in which case it will prepare and publish a Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS).

1.2 Need

FSH, which includes the sub-installation, CB, manages a significant inventory of historic properties (see Section 3.0) and regularly complies with Section 106 of the NHPA on a case-by-case basis through individual, formal external project review in accordance with the procedures set forth in 36 CFR Part 800. The installation has developed and is currently implementing separate ICRMPs for FSH and CB that provide for sound management of historic properties. FSH has identified the need to develop a management based approach to historic properties compliance that moves the installation away from the present costly case-by-case compliance process that is presently required by 36 CFR Part 800. FSH needs to establish a compliance process that is consistent with its internal programming, planning and management to maximize effective use of limited compliance resources and to reduce long-term compliance costs.

1.3. Purpose

The purpose of the proposed action is to develop a uniform, integrated programmatic procedure for management of historic properties on both FSH and CB. The procedure must ensure compliance with all Federal statutes, regulations and Executive Orders applicable to historic property preservation and management. It must also utilize and maximize the existing internal agency planning, management and compliance procedures established in AR 200-4, DA PAM 200-4, and rely on existing structure, roles and responsibilities of installation employees and contractors in the cultural resource management program. The ultimate purpose for the proposed action is to move away from a costly, complex case-by-case review process in favor of a comprehensive, consistent, efficient planning based approach that better serves the goals and mandates of Section 106 and avoids disruption of the FSH's critical National defense mission.

1.4. Scope

1.4.1. The Decision Being Made

This EA is focused at the planning level in both scope and nature. It assesses the environmental impacts of developing and implementing a programmatic approach to complying with Section 106 of the NHPA. It does not purport or attempt to provide a quantitative or qualitative analysis of the site-specific impacts associated with an installation's decision to implement specific projects or activities. Consideration of site

specific impacts will be undertaken at a second level of decision making by installation officials who will, consistent with NEPA, the CEQ regulations and 32 CFR Part 651, make an independent determination of the scope and level of additional documentation, if any, that may be necessary prior to developing and implementing site-specific projects under the HPC.

1.4.2. Environmental Analysis

NEPA directs Federal agencies to prepare an EIS for any major Federal action that significantly impacts the quality of the human environment. The CEQ Regulations and 32 CFR Part 651 recognize that many actions taken by Federal agencies may not have significant impacts. Both the CEQ Regulations and 32 CFR Part 651 provide for a rational, deliberative process that ensures that unnecessary time, resources and paperwork are not dedicated to detailed environmental analysis of every Federal proposal and/or every environmental resource. Agencies are encouraged to focus on true environmental issues of concern. In addition, agencies are authorized to develop Categorical Exclusions (CXs) for specific categories of actions that, over time, have proven not to present individual or cumulative significant impacts to the human environment, absent sensitive resources or exceptional circumstances. Where a CX is not applicable, agencies must prepare an EA to determine whether the Proposed Action would result in significant impacts to the human environment. An EA will result in either a FONSI or the publication of a NOI to prepare an EIS. This EA was developed in compliance with NEPA's mandates as implemented by the procedures published in the CEQ Regulations and 32 CFR Part 651.

The Army considered the impacts on all environmental resources and determined that for all resources, other than historic properties, adoption of the Proposed Action or alternatives to it would likely result in negligible or no impact, or an impact that is unable to be determined at this time. In terms of significance, the CEQ regulations require consideration of both context and intensity. While the context of the impact is broad; i.e. a large inventory of historic properties across a broad landscape; the intensity of impact is negligible. Using the Army Alternate Procedures instead of other NHPA compliance procedures will have little or no impact on historic properties. If there was not the potential for indirect impacts, the Army would have been able to conclude that the use of the Army Alternate Procedures alone was an administrative action with no effect (i.e. no need to even prepare an Environmental Assessment). The purpose of this EA is to examine the "program level" effects of using the Army Alternate Procedures. The effects to historic properties and other environmental resources at the program level are at best speculative. Concrete, identifiable effects/impacts will occur as specific management actions for historic properties are identified and implemented. Fort Sam Houston will have an independent obligation to prepare a site-specific NEPA document to consider the intensity of the impact and whether it is likely to be significant on both historic properties and on all other environmental resources. At this point in time, no further detailed exploration of impacts to those other environmental resources is warranted. Potential impacts to historic properties were identified as environmental issues of concern. The detailed environmental analysis in Section 4 of this EA, therefore, is focused on

consideration of the potential impacts to historic properties (i.e. those properties either listed or determined eligible for inclusion on the National Register of Historic Places pursuant to the NHPA.)

The FSH and CB ICRMPs were supported by an *Environmental Assessment for the Implementation of an Integrated Cultural Resources Management Plan at Fort Sam Houston Training Site* (USACEa 2002) and an *Environmental Assessment for the Implementation of an Integrated Cultural Resources Management Plan at Camp Bullis* (USACEb, 2002). The US Army Medical Command, in 2001, also prepared an *Environmental Assessment for Fort Sam Houston Overall Mission at Fort Sam Houston, Texas* (MEDCOM 2001). The Environmental and Natural Resources Division prepared an *Environmental Assessment for the Overall Mission at Camp Bullis Military Reservation* (ENRD, 2001). FSH has also prepared a *Final Programmatic Environmental Impact Statement for the Fort Sam Houston, Camp Bullis, and Canyon Lake Recreation Area MasterPlan. (PEIS)* (USCOEc, 2001). The PEIS identified proposed construction and demolition activities that may occur through the year 2065 and considered the impacts of the activities. This EA relies on and incorporates much of the information provided in the following documents, including a description of the installation's mission and activities, baseline environmental resources, and direct, indirect and cumulative effects of activities on environmental resources:

- The location and mission of FSH and CB are described in detail in the FSH and CB Mission EAs, Chapters 1 & 2.
- The environmental resources affected by mission activities at FSH and CB are described in detail in the FSH and CB Mission EAs, Chapter 3.
- The environmental consequences of mission activities on all environmental resources, including cultural resources and historic properties at FSH and CB, are described in detail in the FSH and CB Mission EAs, Chapter 4.
- The historic properties located on FSH and the protocols for managing them are included in the FSH and CB ICRMPs.
- The location and mission of FSH and CB, their environmental resources, proposed construction and demolition activities, and their impacts on cultural resources PEIS.

2.0. DESCRIPTION OF THE PROPOSED ACTION AND ALTERNATIVES

2.1. Summary of Scoping

The installation, prior to fully defining the proposed action and alternatives, solicited the views of stakeholders through a series of face-to-face meetings. In particular, the installation met with the SHPO, Advisory Council on Historic Preservation, Federally recognized Indian Tribes, the City of San Antonio, and The Society for the Preservation of Historic Fort Sam Houston. Their participation has been instrumental in fully developing the proposed action and alternatives, and identifying important issues for consideration in this document as well as the HPC.

2.2. Proposed Action

FSH proposes to develop and implement an HPC for compliance with Section 106 of the NHPA and comprehensive management and preservation of historic properties on lands owned or controlled by FSH. These lands include FSH, Camp Bullis, and Canyon Lake Recreational Area. Under the proposed action, undertakings would be identified and reviewed in accordance with the HPC for a five year period rather than 36 CFR Part 800, Subpart B. The installation would be responsible for implementing the HPC and maintaining the professional capabilities for doing so.

- Proposed Action and Outputs:
 - The installation would consult to develop a series of internal Standard Operating Procedures for management of historic properties.
 - The output of that process would be a final, certified HPC as a component to the ICRMPs. The HPC would contain all of the elements required by the AAP and be effective for a five-year period.
 - The installation would review projects with the potential to effect historic properties in accordance with the HPC and its Standard Operating Procedures.
 - The output would be internal application of review procedures and best management practices on a project-by-project basis.
- Comparison to other Alternatives:
 - The HPC would remain a component of the ICRMPs. Like the other two alternatives, the ICRMPs would continue to serve as the plans for management of all cultural resources.
 - Like the other two alternatives, the proposed action would require the installation to: employ professional expertise, identify undertakings, identify properties and evaluate their historic significance, consider effects

to such properties, treat adverse effects, and provide for ongoing involvement of the SHPO, Federally recognized Indian Tribes and interested members of the public.

- Like the other two alternatives, the proposed action would employ management practices and standards accepted by the historic preservation professional community.
- Unlike the other two alternatives, the proposed action would establish the HPC as the Section 106 compliance document, as opposed to a traditional Memorandum of Agreement or Programmatic Agreement.
- Unlike the other two alternatives, the proposed action would focus stakeholder involvement up front in development of the HPC to develop Standard Operating Procedures for the installation to follow when managing historic properties.
- Unlike the other two alternatives, the proposed action would call for the installation to internally review undertakings in accordance with procedures agreed upon and set forth in the HPC, without requiring external, formal case-by-case review.

2.3. Alternatives to the Proposed Action

2.2.1. Alternative 1, No Action Alternative

Alternative 1, the no action alternative, reflects the status quo. The status quo involves compliance with section 106 of NHPA through 36 CFR Part 800.

Under the no action alternative, the installation's compliance with the Council's regulations, 36 CFR Part 800, would continue through compliance with a signed Programmatic Agreement and case-by-case review of larger or more complex projects. The procedures set forth in 36 CFR Part 800 generally requires each installation to consult on a project-by-project basis to: (1) identify and evaluate historic properties, (2) assess effects to them, and (3) resolve adverse effects through execution of a legal compliance document (i.e. a MOA or PA). Consultation must occur with one or more of the following parties: the SHPOs, the Tribal Historic Preservation Officer (THPO), the Council, Federally recognized Indian Tribal governments, and/or Native Hawaiian Organizations. Interested members of the public must also be provided an opportunity to express their views when an undertaking may have adverse effects on historic properties; and, may be invited to participate as a consulting party where the other consulting parties deem it appropriate.

In addition, each MOA prepared for individual undertakings or PA for complex or recurring undertakings requires installations to go through the internal Army review process outline in AR 200-4.

- Actions and Outputs:

- The installation would continue to review individual undertakings in accordance with the procedures set forth in 36 CFR Part 800
 - The installation would develop compliance agreements outside of the existing PA on a project-by-project basis for projects with the potential to result in adverse effects to historic properties.
 - The installations would continue to implement the historic properties portion of their ICRMPs, but implementation would remain a matter of policy.
- Comparison to other alternatives:
 - Like the proposed action, this alternative would require review of all undertakings, identification and evaluation of historic properties, assessment of effects, and, if necessary, treatment of adverse effects.
 - This alternative, like the others, would also require that historic preservation activities be carried out by qualified professionals.
 - This alternative is less efficient than the proposed action. As a result more resources might be devoted to administrative process as opposed to active management of historic properties.
 - The installations would continue to implement the ICRMPs, but the ICRMPs, unlike the proposed action, would not be used as compliance tools, and implementation would, therefore, be discretionary.
 - This alternative, in the long-term places a greater risk of adverse consequences to historic properties as it does not encourage institutionalizing historic property management into day-to-day installation management. However, the distinction in impacts is not considered substantial.

2.2.2 Alternative 2

Section 800.14 of CFR Part 800 sets forth a variety of methods for Federal Agencies to meet their section 106 obligations. Specifically, Section 800.14(b) authorizes PAs to streamline the NHPA process for complex or multiple undertakings. These PAs for complex or recurring undertakings require installations to go through the internal Army review process outline in AR 200-4.

- Actions and Outputs:
 - The installation would review multiple undertakings in accordance with the procedures set forth in 36 CFR Part 800
 - The installation would develop PAs for multiple projects with the potential to result in adverse effects to historic properties.
 - The installations would continue to implement the historic properties portion of their ICRMPs, but implementation would remain a matter of policy.

- Comparison to other alternatives:
 - Like the proposed action, this alternative would require review of all undertakings, identification and evaluation of historic properties, assessment of effects, and, if necessary, treatment of adverse effects.
 - This alternative, like the others, would also require that historic preservation activities be carried out by qualified professionals.
 - This alternative is less efficient than the proposed action. As a result more resources might be devoted to administrative process as opposed to active management of historic properties.
 - The installations would continue to implement the ICRMPs, but the ICRMPs, unlike the proposed action, would not be used as compliance tools, and implementation would, therefore, be discretionary.
 - This alternative, in the long-term places a greater risk of adverse consequences to historic properties as it does not encourage institutionalizing historic property management into day-to-day installation management. However, the distinction in impacts is not considered substantial.

3.0. Affected Environment

Section 1.4.2 references existing documentation that addresses the wealth of environmental resources comprising the human environment affected by FSH operations. Given the narrow focus of the proposed action, the affected environment for purposes of this EA is limited to historic properties at FSH and CB. Historic properties include sites, buildings, structures, districts and objects that are either listed or determined eligible for listing in the National Register of Historic Places. The proposed action will affect the manner in which historic properties are managed at FSH and CB. FSH has conducted historic properties inventories at both FSH and CB, and counts archeological sites, buildings and districts among the properties it manages.

Section 110 of the NHPA requires Federal agencies to identify, survey, and nominate all properties eligible for listing in the NRHP on federally owned or controlled lands. According to Army policy, all installations are required to locate, identify, and maintain all buildings, structures, objects, sites, and districts eligible for inclusion on the NRHP. FSH maintains a list of proposed construction projects as well as a list of those demolition projects scheduled through the year 2065. Some of these properties scheduled for demolition are listed, eligible, or potentially eligible (determination will be made when properties are 50 years old) for inclusion on the NRHP. The PEIS comprehensively addresses the property management and demolition plans for FSH and CB, including the cultural resource aspects of pertinent assets.

3.1 Prehistoric and Historic Archaeological Resources

The cultural history of central Texas, from approximately 10,000 BC to the present, is summarized in the FSH and CB ICRMPs. It also discusses Native American

cultural history in the area, and provides a site-specific historic overview of the FSH and CB Military Reservations. Archaeological studies have been performed at FSH since 1974, when a prehistoric site was discovered in the northeastern portion of the installation. In 1977, the Center for Archaeological Research at the University of Texas, San Antonio began an archaeological and historical survey of both FSH and Camp Bullis. These and subsequent surveys, as well as recorded historic and prehistoric assessments of the sites, revealed degradation of the resources due to 20th-century military activities.

Seven archaeological sites containing both prehistoric and historic components have been identified on FSH; however, none have been determined to be eligible for the NRHP due to their disturbed nature. The exact location of each archaeological site is concealed in order to discourage unauthorized relic collecting and/or vandalism. These investigations constitute approximately a 90 percent survey of the unimpacted lands within the boundaries of FSH and, according to current research for the installation, satisfy the requirements for an intensive archaeological survey of the entire post. Historical documentation, geoarchaeology, and subsurface testing have revealed that extensive disturbances of sediment deposits along Salado Creek in FSH have made the preservation of in situ cultural materials unlikely.

Forty-four archaeological sites containing prehistoric or historic components have been identified on CB. Fourteen of these sites are eligible while the remaining 34 are of unknown eligibility. With the exception of the 6000 acre impact area, the numerous investigations and surveys constitute approximately 99 percent survey of the unimpacted lands within the boundaries of CB and, according to current research for the installation, satisfy the requirements for an intensive archaeological survey of the entire installation.

3.2 Architectural Resources

FSH and CB are rich in architectural resources and have dedicated significant effort toward the identification, preservation, and management of these resources. Of importance to the management of resources at FSH and CB is a 1991 PA that was amended in 1997. The agreement was entered into by the Department of the Army, the Council, the SHPO, and interested persons concerning the continued operation, maintenance and development of FSH and CB and the effect these activities may have on historic properties. The PA addresses FSH's and CB's responsibilities concerning the potential effect on historic properties of the continued operation, maintenance, and development of FSH and CB installation responsibilities regarding the maintenance and treatment of architectural historic properties pursuant to the NHPA and Army regulations and procedures to be followed in the case of proposed demolition actions. The PA is discussed in detail in the PEIS and is valid until implementation of the HPC.

FSH and CB have active cultural resource management programs. Three architectural surveys have been undertaken at FSH and a database for FSH of known architectural resources has been prepared. In 1980, the Historic American Buildings Survey (HABS) Level IV building and structure evaluation documentation was completed for 1,945 resources by the USACE, Fort Worth District. In 1993, an NRHP

assessment of 1,917 buildings was undertaken using the Public Works Business Center Building Information Schedule. A survey in 1997 clarified the 1993 survey information and determined NRHP and NHLD eligibility for 1,427 architectural resources dating from 1876 to 1946. Of these resources, 760 architectural resources and 13 landscape features were determined to be eligible for the NRHP: 271 were located within the National Historic Landmark District (NHL) and dated primarily from 1876 to 1930; 439 were located within the potential NHLD and dated primarily from 1931 to 1946; and 50 were located throughout the installation. One landscape feature and 667 buildings were determined ineligible for listing on the NRHP. Architectural surveys at CB have determined that 81 buildings and structures and 32 landscape features are eligible while 283 buildings and structures are not eligible. Most of the eligible properties are located in the cantonment area which has been recommended as a potential National Register District.

The majority of the NRHP eligible resources at FSH form parts of enclaves that are united historically or aesthetically by plan or physical development. These enclaves, or districts, reflect an arrangement of historically or functionally related properties. Such districts may encompass several interrelated activities, such as an area that includes industrial, residential, or commercial buildings. FSH has two such areas: the NHLD, encompassing the older pre-1930 section of the post, which is currently listed on the NRHP; and the post-1930 to 1946 portion of the installation, known as the National Conservation District. The NHLD nomination for this district has not been accepted. The Department of the Army has recommended that this area be re-nominated as a district. The designation of these two areas recognizes their historical, architectural, and cultural significance. Both the designated District and the Conservation District were established to recognize and protect buildings and structures that are of national significance. Principally, the existing NHLD was established by evaluating the entire old post sections of the Quadrangle, Staff Post, Infantry Post, Artillery Post and Cavalry Post as a unit representative of a significant period of American history. Similarly, the area of the Conservation District, also known as the “New Post,” was declared a “historic register conservation district” because it is believed to hold significance to the history of the region and to FSH by virtue of its architecture and its contributing history from 1931 through 1946.

To date, five historic properties at FSH have been listed on the NRHP: the Quadrangle (Building 16); the Clock Tower (Building 40); the Gift Chapel (Building 2200); Pershing House (Quarters 6); and Brooke Army Medical Center (Building 1000). Six significant landscapes within the historic district have been identified as requiring special attention: the Quadrangle; the Staff Post; the Infantry Post; the Cavalry and Artillery Parades; the New Post; and the New Post East. Thirteen significant historic landscape features associated with the design and function of FSH have also been identified. Camp Bullis has no historic properties listed on the NRHP.

4.0 Environmental Consequences

4.1 Significance Threshold

A significant impact to an historic property would occur if the proposed action or alternatives would result in the destruction an historic property of national significance.

4.2 Environmental Resources other than Historic Properties

As noted in Table 1, neither the proposed action nor the no action alternative is anticipated to have any discernible direct, indirect or cumulative impact on any environmental resource other than historic properties beyond the existing baseline condition.

4.3 Historic Properties.

4.3.1 Alternative 1, No action alternative

4.3.1.1 Direct Impact

The no action alternative would not change existing compliance or management practices for historic properties. Therefore, there would be no direct impacts resulting from the no action alternative.

4.3.1.2 Indirect Impact

The no action alternative would not change existing compliance or management practices for historic properties. Therefore, there would be no indirect impacts resulting from the no action alternative.

4.3.1.3. Cumulative Impacts

The no action alternative would not change existing compliance or management practices for historic properties. Therefore, there would be no cumulative impacts resulting from the no action alternative.

4.3.2 Proposed Action

4.3.2.1 Direct Impact

The proposed action, like the no action alternative, would continue to require the installation to identify projects with the potential to effect historic properties. The installation would remain responsible for assessing effects to such properties, and, where appropriate, treating adverse effects. The installation would remain responsible for applying professional expertise and involving stakeholders. The primary distinction would be the installations implementation of an agreed-upon plan for management of historic properties. The installation would not be required to seek formal external review of projects. The installation would use its HPC, a component of the ICRMPs, as its method for complying with Section 106 of the NHPA. As a result, the process will be

stream-lined and efficient. Historic property management would be better integrated into installation facilities and land planning and management. The proposed action, therefore would have a direct beneficial impact on historic properties. The impact is not considered significant.

4.3.2.2 Indirect Impacts

Development and implementation of the HPC should result in development of stronger relationships with stakeholders and the potential for greater stakeholder involvement in management of historic properties on FSH and CB. In addition, the HPC will serve as a legal compliance agreement and is thus more likely to receive funding for implementation. A management approach to compliance should raise the visibility and awareness of historic preservation among all function elements of the installation. The proposed action, therefore, is likely to result in indirect beneficial impacts to historic properties on FSH and CB. These impacts are not anticipated to be significant.

4.3.2.3 Cumulative Impacts

A cumulative impact occurs when the proposed action has the potential to synergistically combine with the impacts of past, present or reasonably foreseeable future actions in a way that increases the scope and or intensity of the action's impact. There are no anticipated cumulative impacts associated with the proposed action.

4.3.3. Alternative 2

4.3.3.1 Direct Impact

Alternative 2 would not change existing compliance or management practices for historic properties. Therefore, there would be no direct impacts resulting from Alternative 2.

4.3.3.2 Indirect Impact

Alternative 2 would not change existing compliance or management practices for historic properties. Therefore, there would be no indirect impacts resulting from Alternative 2.

4.3.3.3 Cumulative Impact

A cumulative impact occurs when an action has the potential to synergistically combine with the impacts of past, present or reasonably foreseeable future actions in a way that increases the scope and or intensity of the action's impact. There are no anticipated cumulative impacts associated with Alternative 2.

5.0 Conclusion

This EA documents the installation's hard look at the potential direct, indirect and cumulative impacts associated with implementation of a proposed action and a no action alternative. None of the three alternatives will result in any discernible impact to environmental resources other than historic properties. The no action and proposed action alternatives are less efficient than the proposed action. As a result, more resources might be devoted to administrative process as opposed to active management of historic properties. The proposed action would establish the HPC as the Section 106 compliance document, focus stakeholder involvement up front in the development of the HPC to develop SOPs and would call for the installation to internally review undertakings without requiring external, formal case-by-case review.

6.0 List of Preparers and Agencies Consulted

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Scott M. Farley is an environmental attorney working for the US Army Environmental Center's Office of Command Counsel. He focuses on natural and cultural resource conservation and National Environmental Policy Act issues affecting Army programs, policies and activities. Much of his work involves historic preservation under the National Historic Preservation Act and threatened and endangered species conservation under the Endangered Species Act. Prior to coming to the Army, Mr. Farley worked as a trial attorney for the US Department of Justice's Environment and Natural Resource Division where he litigated cases nationally involving Federal agency compliance with natural and cultural resource compliance laws, the National Environmental Policy Act and Federal land and resource management statutes. Mr. Farley is a graduate of Boston College where he received his B.A. in political science in 1988, and Boston College Law School where he received his J.D. in 1991.

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Advisory Council
San Antonio Conservation Society
The Society for the Preservation of Historic Fort Sam Houston
City of San Antonio

Texas Historical Commission
Tonkawa Tribe
Wichita and Affiliated Tribes
Comanche Tribe
Mescalero Apache Tribe
U.S. Fish and Wildlife Service
Texas Parks and Wildlife Department

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US Army

2002 Environmental Assessment for the Implementation of an Integrated Cultural Resources Management Plan at Camp Bullis, Texas. U.S. Corps of Engineers (USCOEb)